

MICHAEL D. LONG (CA State Bar #149475)  
901 H Street, Suite 301  
Sacramento, CA 95814  
(916) 201-4188  
Mike.Long.Law@msn.com

Attorney for DUSTIN BROWN

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

THE UNITED STATES OF AMERICA,	) No. 2:24-cr-268 WBS
Plaintiff,	)
	) STIPULATION AND
	) ORDER TO CONTINUE STATUS
v.	) CONFERENCE FOR BOTH DEFENDANTS
	)
DUSTIN BROWN and	) Requested status conference date: 7-28-2025
MATTHEW MICHALAK,	) Time: 10:00 a.m.
Defendants.	) Judge: Hon. William B. Shubb
	)
=====	)

STIPULATION REGARDING A NEW STATUS CONFERENCE DATE OF JULY 28, 2025

It is hereby stipulated between the parties, Alexis Klein, Assistant United States Attorney, Todd Leras, attorney for defendant MATTHEW MICHALAK and Michael D. Long, attorney for defendant DUSTIN BROWN, that the status conference set for May 27, 2025, at 10:00 a.m. should be continued and re-set for July 28, 2025, at 10:00 a.m.

Both Mr. Leras and Mr. Long need to continue to read the discovery, review the discovery with his client, and assess the facts, the charges and potential defenses. Mr. Brown is housed in the Yuba County Jail in Marysville, which only has one attorney booth in which lawyers can pass documents to clients, which in turn makes meetings with Mr. Brown more difficult to schedule. Mr. Michalak was housed for 90 days in an in-patient rehabilitation facility, which made it more difficult for Mr. Leras to go over the discovery with him (there is a protective order concerning the discovery, so the discovery cannot be simply given to a defendant).

1 The parties further agree that this court should make a finding of good cause for the  
2 requested extension and that in fact good cause is hereby shown. The government has provided  
3 over 350 pages of discovery and many hours of video and audio recordings. The government has  
4 made additional discovery available for review by defense counsel, including seized digital devices.  
5 All attorneys continue to read and view the discovery, investigate the case and meet with their  
6 respective clients. Counsel for defendants believe that failure to grant the above-requested  
7 continuance would deny counsel the reasonable time necessary for effective preparation, taking  
8 into account the exercise of due diligence.  
9

10 All parties are available to appear in this case on July 28, 2025.  
11

12 Each party further stipulates that the ends of justice served by granting such continuance  
13 outweigh the best interests of the public and of all the defendants in a speedy trial. Time has already  
14 been excluded through May 27, 2025.

15 All parties request the date of July 28, 2025, for the status hearing. The request for  
16 extending the date for the status conference is at the specific request of each of the defendants and  
17 with the knowing, intelligent and voluntary waiver of each defendant's speedy trial rights under the  
18 law. The government agrees that a continuance is necessary. Good cause is hereby shown.  
19

20 For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq.,  
21 within which trial must commence, the time period from today's date to July 28, 2025, inclusive,  
22 is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4] because it  
23 results from a continuance granted by the Court at defendants' request on the basis of the Court's  
24 finding that the ends of justice served by taking such action outweigh the best interest of the  
25 public and the defendant in a speedy trial.  
26

27  
28 ///

1 Dated: May 13, 2025

Respectfully submitted,

2 /s/ Michael D. Long

3 MICHAEL D. LONG  
4 Attorney for Dustin Brown

5 /s/ Todd Leras

6 TODD LERAS  
7 Attorney for Matthew Michalak

8 Dated: May 13, 2025

MICHELE BECKWITH  
9 Acting United States Attorney

10 /s/ Alexis Klein

11 ALEXIS KLEIN  
12 Assistant U.S. Attorney

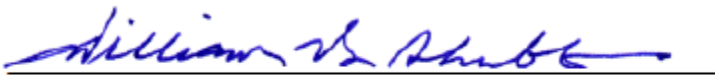
13  
14 ORDER

15 **GOOD CAUSE APPEARING AND HAVING BEEN SHOWN, IT IS SO ORDERED.**

16 The date for the status hearing in this matter is hereby re-set for July 28, 2025, at 10:00 a.m.,  
17 before District Court Judge William B. Shubb.

18 Time is is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code  
19 T4] because it results from a continuance granted by the Court at defendants' request on the basis  
20 of the Court's finding that the ends of justice served by taking such action outweigh the best  
21 interest of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(1)(D). Time is  
22 excluded through the new hearing date of July 28, 2025.  
23

24 Dated: May 14, 2025

25   
26 WILLIAM B. SHUBB  
27 UNITED STATES DISTRICT JUDGE  
28